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Attorney for Gabriel Zendejas-Chavez

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

GABRIEL ZENDEJAS-CHAVEZ,

Defendant.

No. CR 18-cr-173-GW

DEFENDANT GABRIEL ZENDEJAS-
CHAVEZ'S RESPONSE TO GOVERNMENT'S
MOTION IN LIMINE TO PRECLUDE
DURESS DEFENSE

Defendant Gabriel Zendejas-Chavez, by and through his counsel,
Meghan Blanco, files the instant response to the government's motion
in limine to preclude duress defense.

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1 This response is based on the records and files in this case,
2 and such oral or documentary evidence as may be presented at the
3 hearing on the government's motion and during trial.

4 Respectfully Submitted,

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6 Dated: July 27, 2022

7 //s// Meghan Blanco
8 MEGHAN BLANCO
9 COUNSEL FOR DEFENDANT
10 GABRIEL ZENDEJAS-CHAVEZ
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MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION AND FACTS

Defense previously provided government counsel notice of its intent to utilize what could be characterized as a duress defense, at trial. The defense advised that it did not believe the defense properly fit within the confines of duress, as Mr. Zendejas-Chavez did not, in fact, commit a crime, but that it was providing notice in an abundance of caution. Should Mr. Zendejas-Chavez utilize a duress defense at trial, he will provide the Court with an offer of proof beforehand.

Respectfully Submitted,

Dated: July 20, 2022

//s// Meghan Blanco
MEGHAN BLANCO
COUNSEL FOR DEFENDANT
GABRIEL ZENDEJAS-CHAVEZ